

HON. ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

THE ESTATE OF AMIR HOZAIEN
(Deceased), by and through his personal
representative, Mary Harm; and CHRISTINE
HOZAIEN, individually and as surviving parent
to Amir Hozaien,

Plaintiffs,

vs.

FRANCISCO MANUEL LOPEZ, an individual
and dba AARON TRUCKING; AARON
TRUCKING, a business entity, MIKE
CAMPBELL & ASSOCIATES, LTD., a
California corporation, and UNKNOWN JOHN
DOES,

Defendants.

NO. C09-5278 RJB

DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' INITIAL DISCLOSURES

COME NOW defendants, Francisco Lopez, Aaron Trucking, and Mike Campbell & Associates, Ltd., (collectively referred to as "Defendants"), by and through the undersigned counsel of record, and hereby submits the following objections to Plaintiffs' Initial Disclosures as follows:

DEFENDANTS' OBJECTIONS TO PLAINTIFFS'
INITIAL DISCLOSURES - 1

FLOYD, PFLUEGER & RINGER P.S.
300 TRIANON BUILDING, 2505 THIRD AVENUE
SEATTLE, WA 98121-1445
TEL 206 441-4455
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<u>No.</u>	<u>Description</u>	<u>Objection</u>
1.	Washington State Patrol reports and complete accident investigation	Federal Rules of Evidence 403, 410, 602, 701, 801, and 805.
2.	Clark County Fire & Rescue – medical response records	Federal Rules of Evidence 403, 410, 602, 701, 801, 802, and 805.
3.	Clark County Medical Examiner's autopsy report and death certificate	Plaintiffs have not produced.
4.	Scientific Games International – Employment, wage, salary and benefits information	Federal Rules of Evidence 701, 702, 703, 801, and 802.
5.	Preliminary Economic Appraisal prepared by James Horrell, Ph.D	Federal Rules of Evidence 401, 402, 403, 701, 702, 703, 801, and 802.
6.	Personal and Family photographs of Amir Hozaien	No objection.
7.	Copy of Amir Hozaien's Passport	No objection.
8.	Colored photograph of Amir Hozaien's dental x-ray	Federal Rules of Evidence 401, 402, and 403.
9.	Copy of Amir Hozaien's proof of citizenship	No objection.
10.	Copies of documentation prepared in the process of obtaining authorization to transport the body of Amir Hozaien from the United States to Austria	No objection.
11.	Copy of Amir Hozaien's birth certificate issued in Linz, Austria	No objection.
12.	Copy of Amir Hozaien's Death Certificate issued by the State of Washington, Dept. of Health	No objection.
13.	Copy of Memorial Booklet from Amir Hozaien's funeral service	Federal Rules of Evidence 401, 402, 403, 801, and 802. Indecipherable and incomplete.
14.	Copies of printed news articles and media reports concerning this accident obtained via the internet, including any photos that may have been associated with said vehicle	Federal Rules of Evidence 402, 403, 602, 701, 801, and 802. Incomplete.
15.	Video clips of television news reports concerning this accident	Federal Rules of Evidence 402, 403, 602, 701, 801, and 802. Incomplete.
16.	Documents obtained through plaintiff Christine Hozaien, Sherin Hozaien, and Mary Harm evidencing ways in which Plaintiff Amir Hozaien provided support for his mother, Christine Hozaien, as well as his siblings, including but not limited to receipts for goods and services, bank statements, employment information and such	Federal Rules of Evidence 402, 403, 602, 701, 801, and 802. Indecipherable and incomplete.

DEFENDANTS' OBJECTIONS TO PLAINTIFFS'
INITIAL DISCLOSURES – 2

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1 DATED this 14th day of January, 2010.

2 FLOYD, PFLUEGER & RINGER, P.S.

3
4 By: s/ Kerry B. Gress

5 Francis S. Floyd, WSBA#10642

6 Kerry B. Gress, WSBA#31791

7 ffloyd@floyd-ringer.com

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9 Attorneys for Defendants Lopez, Aaron

10 Trucking and Mike Campbell & Associates

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of January, 2010, I electronically filed the foregoing with the Clerk of the Court via the CM/ECF System, which will send notification of such filing to the following:

Paul Luvera
David Beninger
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DATED this 14th day of January, 2010.

s/ Kerry B. Gress
Kerry B. Gress, WSBA#31791